

EXHIBIT C



Greensfelder, Hemker & Gale, P.C.
10 South Broadway
Suite 2000
St. Louis, MO 63102

12 Wolf Creek Drive
Suite 100
Belleville (Swansea), IL 62226

T: 314-241-9090
F: 314-241-8624
www.greensfelder.com

Edward S. Bott, Jr.
Direct Dial (314) 516-2690
FAX (314) 241-4245
e-mail address
esb@greensfelder.com

November 7, 2019

Via Email

Kyle W. Farrar
Kaster, Lynch, Farrar & Ball, LLP
1010 Lamar, Suite 1600
Houston, TX 77002
kyle@fbtrial.com

Re: *Susman, et al. v. The Goodyear Tire & Rubber Co.*
Case No. 8:18-cv-00127

Dear Kyle:

The Goodyear Load Range E claim files which have been located by Goodyear in response to the court's order of October 7, 2019 were made available for plaintiffs' inspection beginning November 4, 2019 at Goodyear's headquarters in Akron, Ohio. Plaintiffs performed a partial review of approximately 6-8 boxes over the course of a few hours on both November 4 and November 5. On November 5 you indicated to me that you wanted copies of all of the claim file documents at your expense, and that you would hire a copy service to do the reproduction. I discussed the logistics of the document production with my client, and want to offer some suggestions on how to get you the copies you have requested.

The files contain personal identifiable information on claimants, as well as other information covered by the Protective Order. Goodyear will make the files available for copying by a reputable copy service at plaintiffs' expense and subject to agreement on a reasonable protocol for marking the documents for protection. Given the number of boxes involved, we will make them available to the copy service on a rolling basis. A copy of what your copy service provides to you will be provided to Goodyear at its expense.

Since dictating this letter I received your letter of today's date. Let's discuss. Best regards.



Kyle W. Farrar
November 7, 2019
Page 2

Very truly yours,

GREENSFELDER, HEMKER & GALE, P.C.

By



Edward S. Bott, Jr.

ESB/rlv

cc: Paul E. Godlewski (via email)
Michael F. Coyle (via email)
Jennifer D. Tricker (via email)

1824327